

Water Resources Division  
Resource Management Directorate  
Nunavut Regional Office  
918 Nunavut Drive  
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Your file - Votre référence  
2BE-HLP  
Our file - Notre référence  
GCDocs#148451772

July 9, 2026

Robert Hunter  
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Nunavut Water Board  
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**Re: Crown-Indigenous Relations and Northern Affairs Canada's Response to  
Applicant Reply to Comments of the Licence Application for the Hook Lake  
Project, Type B Water Licence No. 2BE-HLP.**

Dear Robert,

Thank you for the July 06, 2026 invitation to review the Applicant's reply to CIRNAC's responses of referenced licence 2BE-HLP, submitted by Eric Sondergaard from 6106 Resources Limited, for Type B Water Licence No. 2BE-HLP.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act* and provides the following Technical Review Memorandum for the Board's consideration.

If there are any questions or concerns, please contact me at (873) 800-5240 or [Pauline.Firmin@rcaanc-cirnac.gc.ca](mailto:Pauline.Firmin@rcaanc-cirnac.gc.ca) or Andrew Keim at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

*Pauline Firmin*

Pauline Firmin, M. Sc,  
Regional Coordinator

**Table 1: Summary of Recommendations**

| Recommendation Number | Subject                                                                                                            | Status                 |
|-----------------------|--------------------------------------------------------------------------------------------------------------------|------------------------|
| R-01                  | Missing Management Plans and Supplemental Information Guidelines (SIG)                                             | Resolved with comments |
| R-02                  | Missing Information On Water Sources, Water Use Measurement, Monitoring Of Lake Drawdown And Method Of Extraction. | Partially unresolved   |
| R-03                  | Missing Information On Waste Quantification And Waste Water And Sumps Management                                   | Resolved               |
| R-04                  | Missing Description Of Environmental Impact Linked To Water And Waste And Studies Or Survey                        | Resolved with comments |
| R-05                  | Conflicting Proposed Timeline                                                                                      | Resolved               |
| R-06                  | Missing Information In the Application Form                                                                        | Resolved with comments |

**A. DOCUMENTS REVIEWED AND REFERENCED**

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

**Table 2: Documents Reviewed and Referenced**

| Document Title                                              | Author, File No., Rev., Date   |
|-------------------------------------------------------------|--------------------------------|
| 2BE-HLP---- New Application - CIRNAC Response to 6106 Reply | Eric Sondergaard, July 5, 2026 |
| Possible_water_source_esker.kml                             | No author, No date             |

## **B. RESULTS OF REVIEW**

### **1. Missing Management Plans and Supplemental Information Guidelines (SIG)**

#### **Comment:**

CIRNAC notes that no management plans were submitted along with the water licence application, and that a Supplemental Information Guideline (SIG) for Mineral Exploration / Remote Camp does not appear to have been filed. Several elements typically addressed through management plans and the SIG were also not identified in other supporting documentation.

The requirement for supplemental information as part of the Water Licence Application is outlined in section 6 and 7 of Guide 4 : Completing and Submitting a Water Licence Application for a New Licence, Nunavut Water Board, July 2015.

CIRNAC notes that the provision of such information would assist in the evaluation of potential effects and in determining whether additional details may be required to inform water licence conditions.

#### **Recommendation:**

(R-01) CIRNAC recommends that the applicant provide more information to support the assessment of the application. Without limiting the scope of information that may be required, this could include, but is not limited to, the following:

- A Spill Contingency and fuel Management Plan;
- A Closure and Reclamation Plan, including provisions for interim or seasonal closure;
- A Waste Management Plan;
- An Operations and Management Plan for camp infrastructure;
- The Supplemental Information Guideline (SIG) for Mineral Exploration / Remote Camp (MM1), with responses to the information requirements outlined therein.

CIRNAC recommends that the applicant ensure all pertinent required information as outlined in the SIG is presented and consistent with what is indicated in the General Water Licence Application.

#### **Proponent Response:**

6106 accepts CIRNAC's recommendation. The attached response package will include the following supplemental materials:

1. Spill Contingency and Fuel Management Plan;
2. Abandonment and Restoration Plan, including interim and seasonal closure provisions;
3. Waste Management Plan;

The following will be submitted separately:

4. Camp Operations and Management Plan; and
5. Completed Supplemental Information Guideline for Mineral Exploration / Remote Camp.

These documents are intended to supplement and clarify the original application and to ensure consistency with the General Water Licence Application.

**Response to Reply:**

CIRNAC thanks 6106 Resources for the supplemental materials.

CIRNAC notes that the Hook Lake Project Waste Management Plan states that hazardous and potentially hazardous wastes will be managed using secondary containment where required (Section 5), and further references secondary containment for fuel and hazardous materials as part of the project's waste management infrastructure (Section 11).

However, CIRNAC was unable to identify mentions within the Fuel Spill Contingency Plan describing how secondary containment will be incorporated into fuel storage. Secondary containment for fuel containers is paramount to minimize the risk of fuel releases to land and water and in evaluating the effectiveness of proposed spill prevention measures. CIRNAC recommends that secondary containment be explicitly mentioned as a part of the Fuel Spill Contingency Plan.

**Proponent Response to Reply:**

CIRNAC noted that the Waste Management Plan references secondary containment for fuel and hazardous materials, but that similar wording was not clearly identified in the Fuel Spill Contingency Plan.

6106 confirms that fuel, waste oil, lubricants and hazardous materials will be stored and handled using appropriate secondary containment, as applicable. This may include lined berms, insta-berms, spill trays, drip trays, sealed containers or equivalent containment measures depending on the material, location and activity.

Fuel drums and fuel caches will be stored in appropriate secondary containment where required. Active drums, pumps, generators and fuel transfer points will use drip trays or equivalent local containment during operation. Spill kits will be maintained at fuel storage areas, active fuel transfer locations, drill areas and camp.

Where fuel-powered pumps are used for water withdrawal, the pump and fuel containers will be managed to minimize shoreline disturbance and prevent releases to water. Refuelling will not occur over water.

6106 can update the Fuel Spill Contingency Plan to expressly include this secondary containment language if requested by the NWB or required as a condition prior to licence issuance.

**CIRNAC's Response to Reply:**

CIRNAC thanks the proponent for their response and recommends that the Nunavut Water Board ensure that the Fuel Spill Contingency Plan is updated and re-issued to contain express mention of appropriate secondary containment of fuel, waste oil, lubricants, and hazardous materials.

**2. Missing Information On Water Sources, Water Use Measurement, Monitoring Of Lake Drawdown And Method Of Extraction.**

**Comment:**

CIRNAC notes that in the Water Licence Application, the proposed water source is described as “nearby water sources that do not freeze to the bottom”, that water quality and available capacity are described as “potable water for camp use, regular lake water for drilling purposes” and that the estimated quantities of water to be used from each source are identified as “unknown at this time” (Water Licence Application, Block 12). CIRNAC recognizes that the nature of mineral exploration can make early identification of precise water sources challenging; however, the absence of information on potential water bodies, methods for assessing sustainable withdrawal limits, extraction methods, and potential cumulative use limits the ability to assess whether proposed withdrawals could be supported without adverse effects.

**Recommendation:**

(R-02) CIRNAC recommends that the applicant provide additional clarification to support the review of water use and sustainability such as:

- A list of potential lakes or watercourses that may be used as water sources;
- Information on the approach to assessing sustainable withdrawal limits, such as under-ice lake volume or streamflow considerations, to ensure withdrawals remain within accepted thresholds;
- Further details on water extraction methods, including the type of pump to be used, intake placement, and measures to minimize shore disturbance;
- Information on how water withdrawal volumes would be metered and tracked during operations; and
- Clarification on whether other operators or activities in the area may use the same water bodies, and how potential cumulative effects on water availability may be considered.

CIRNAC notes that such clarification would assist in evaluating potential effects associated with water use and support the development of appropriate licence conditions.

**Proponent Response:**

6106 acknowledges CIRNAC's request for additional detail regarding potential water sources, withdrawal limits, extraction methods, water use tracking and cumulative water use.

Final water source selection will be made in the field based on proximity to the final camp and drill areas, suitability of the waterbody, avoidance of sensitive areas, and confirmation that the waterbody is capable of supporting the proposed withdrawal. Potential water sources will be identified on an updated map, and final coordinates will be provided to the NWB and Inspector before use.

Water withdrawal volumes will be measured using a flow meter or, where appropriate, calculated using pump rate and operating hours, with daily water use recorded in a field log. Intake locations will be selected to minimize shoreline disturbance. Pumps and fuel will be managed with appropriate setbacks and secondary containment. All intakes will use DFO-compliant fish screens.

6106 is not aware of other operators using the same local waterbodies for the proposed program. However, 6106 will monitor field conditions and adjust water sources if cumulative withdrawal concerns are identified.

**Response to Reply:**

CIRNAC thanks the proponent for the additional information provided.

CIRNAC acknowledges that the final camp location has not yet been determined and that the proponent has committed to identifying water sources and providing final coordinates prior to use. However, no preliminary list or map of potential water sources within the prospective camp and exploration areas was provided. While CIRNAC recognizes that mineral exploration programs often require flexibility in final water source selection, the intent of the request was to obtain information on likely water sources under consideration to support an assessment of whether available waterbodies are capable of sustaining the proposed water demand.

In addition, CIRNAC acknowledges the proponent's commitment to confirm that selected waterbodies can support the proposed withdrawals; however, no information was provided regarding the methodology that will be used to assess waterbody capacity and determine whether planned withdrawals are protective of the water source and consistent with accepted practices by the Nunavut Water Board.

CIRNAC is reiterating its recommendation that additional information is provided regarding potential water sources and the methodology that will be used to evaluate sustainable withdrawal limits.

**Proponent Response to Reply:**

CIRNAC noted that no preliminary list or map of potential water sources was provided, and requested additional information regarding potential water sources and the methodology to be used to evaluate sustainable withdrawal limits.

6106 has attached a KML file identifying the proposed water source area for camp use. The final water source selection will be confirmed in the field based on proximity to the final camp location, waterbody suitability, safe access, and confirmation that the waterbody is capable of supporting the proposed withdrawal.

Final source coordinates will be provided to the NWB and Inspector prior to use, if required.

Before withdrawing water from any source, 6106 will:

1. confirm that the proposed source is of sufficient size and depth to support the planned use;
2. avoid shallow waterbodies that may freeze to bottom or show evidence of limited capacity;
3. where winter or ice-covered withdrawal is required, water depth will be tested with an auger and will apply a conservative withdrawal limit consistent with accepted northern practice, including limiting withdrawal to no more than 10% of available under-ice water volume unless otherwise approved;
4. where open-water withdrawal is used, monitor for visible drawdown or shoreline effects and reduce, rotate or discontinue use if drawdown concerns are observed;
5. use DFO-compliant fish screens on all water intakes;
6. place intakes to minimize disturbance to banks, shorelines and lakebed sediments;
7. meter water withdrawals using a flow meter, or calculate volumes using pump rate and operating hours where metering is not practicable;
8. record daily water use in a field log, including source, estimated or metered volume, purpose of use and any observed concerns; and
9. rotate or change sources if field conditions, cumulative withdrawal or waterbody capacity indicate that continued use is not appropriate.

6106 is not aware of other operators using the same local waterbody for the proposed program. If other use is identified during field operations, 6106 will consider cumulative withdrawal in source selection and adjust water use accordingly.

**CIRNAC's Response to Reply:**

CIRNAC thanks the proponent for the additional information concerning the methodology used to evaluate sustainable withdrawal limits. CIRNAC recommends that the Nunavut

Water Board ensure that all necessary measures are included as licenced requirements to ensure safe withdrawal of water bodies and that withdrawal does not exceed 10% of under ice lake volume and 10% of instantaneous flow or 30% of mean annual flow.

CIRNAC thanks the proponent for the provided *km/* file indicating the location of a possible water source. However, this map does not allow CIRNAC to evaluate whether available waterbodies under consideration in the area are capable of sustaining the proposed water withdrawal. No preliminary list or map of potential water sources within the prospective camp and exploration areas was provided with information such as the area of the water sources under consideration or the maximum seasonal drawdown these water sources might provide.

While CIRNAC recognizes that mineral exploration programs often require flexibility in final water source selection and that the proponent has committed to identifying water sources and providing final coordinates prior to use, CIRNAC recommends that the Nunavut Water Board ensure that the proponent produces a list or map of possible water sources in the planned area of exploration, containing enough information to determine if available waterbodies are capable of sustaining the proposed water demand prior to issuance of the licence.